

Exhibit 27

PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO EXCLUDE GENERAL CAUSATION TESTIMONY OF PLAINTIFFS' EXPERTS

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
SPRING STREET COURTHOUSE

COORDINATION PROCEEDING SPECIAL TITLE [RULE 3.400]	JUDICIAL COUNCIL COORDINATION PROCEEDING NO. 5255
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IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION (JCCP No. 5255)	Lead Case Number For Filing Purposes: 22STCV21355
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THIS DOCUMENT RELATES TO: Christina Arlington Smith, et al., v. TikTok Inc., et al., Case No. 22STCV21355, Los Angeles Superior Court	Assigned Coordination Hon. Carolyn B. Kuhl SSC-12
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VIDEOTAPED DEPOSITION OF
IAN GOTLIB, Ph.D.
HIGHLY CONFIDENTIAL
Friday, July 11, 2025
PALO ALTO, CALIFORNIA

Reported By:
KATHLEEN A. MALTBIE, STENOGRAPHIC REPORTER
California CSR 10068, Nevada CCR 995, Texas CSR
12212, RPR-RMR-CRR-CCRR-CLR-CRC-RDR

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<p style="text-align: right;">Page 70</p> <p>1 Q. Do you see the post-COVID-19 assessment 2 there, the Methods section? 3 A. Yes, you're right. I apologize. 4 Q. So is it correct that this poster did 5 involve administering the social media -- 6 A. Yes. 7 Q. -- use questionnaire? 8 Is that correct? 9 A. That's correct. 10 Q. Okay. And that's a self-reporting tool, 11 correct? 12 A. Correct. 13 Q. Okay. In your reports, you criticize 14 studies of the relationship between social media and 15 mental health on the basis that they often rely on 16 self-reported symptoms rather than clinical 17 diagnoses, correct? 18 A. Correct. 19 Q. Okay. And you do that in paragraph 86 of 20 your initial report, one place, if you could 21 confirm? 22 A. Yes, that's correct. 23 Q. Okay. Let's look at Tab O, please. Oh, 24 okay, if you -- you actually already have this one. 25 If you could turn back to Exhibit 14. If you don't</p>	<p style="text-align: right;">Page 72</p> <p>1 San Francisco Bay Area who were participating in a 2 larger longitudinal study assessing the effects of 3 early life stress on psychobiology across puberty; 4 is that correct? 5 A. Correct. 6 Q. And that's that longitudinal cohort from 7 the NIH grant we discussed earlier, correct? 8 A. Correct. 9 Q. Thanks. And thank you for the reminder. 10 Do you consider that a large sample size? 11 A. We did when we started. Not so much now. 12 Q. Okay. Under the Methods and Materials 13 section of the study, which starts at the bottom of 14 the first page, and then continues, you write (as 15 read): 16 Participants self-reported 17 their depressive symptoms using the 18 ten-item version of the Children's 19 Depression Inventory. 20 Is that correct? 21 A. Correct. 22 Q. Okay. And you continue (as read): 23 This widely used reliable 24 measure has been shown to have 25 convergent validity with clinician</p>
<p style="text-align: right;">Page 71</p> <p>1 find it, let me know. 2 A. I have it. 3 Q. Okay. You're doing better than me in 4 tracking exhibits. 5 Exhibit 14 was a study entitled "Effects 6 of the COVID-19 Pandemic on Mental Health and Brain 7 Maturation in Adolescents: Implications for 8 Analyzing Longitudinal Data," correct? 9 A. Correct. 10 Q. And you're the primary author on this 11 study? 12 A. On the -- yes, I am. 13 Q. And this is a study from 2022, correct? 14 A. '23, I think. Oh, it says '22 on the 15 bottom. Okay. 16 Q. Dates are sometimes confusing on these, 17 because they are published or online at a different 18 time than they say. 19 A. Right. 20 Q. Okay. This study sought to assess if the 21 pandemic adversely affected adolescents' mental 22 health and neurodevelopment, correct? 23 A. Correct. 24 Q. And you note here that the participants in 25 this study were 163 adolescents living in the</p>	<p style="text-align: right;">Page 73</p> <p>1 ratings of depression symptoms and 2 diagnosis. 3 Is that correct? 4 A. Correct. 5 Q. Does that mean that the Children's 6 Depression Inventory is a self-report tool that has 7 been shown to have a strong relationship to clinical 8 diagnoses of depression? 9 A. Yes. 10 Q. Okay. And you also then use the Social 11 Anxiety and Physical Symptoms subscales of the 12 Multidimensional Anxiety Scale for Children to 13 assess anxiety symptoms, correct? 14 A. Yes. 15 Q. That's also a self-reporting tool? 16 A. It is. Both of those measures, the 17 Children's Depression Inventory and the MASC, are 18 measures of symptoms of depression and anxiety, 19 respectively. 20 But they are not diagnostic tools. 21 Q. Right. 22 And then you note that you also assessed 23 internalizing and externalizing symptoms using the 24 validated subscales of the Youth Self-Report version 25 of the Child Behavior Checklist, correct?</p>

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<p style="text-align: right;">Page 74</p> <p>1 A. Correct.</p> <p>2 Q. And that's another self-report tool?</p> <p>3 A. That's correct.</p> <p>4 Q. Okay.</p> <p>5 A. It's -- those are self-report measures of</p> <p>6 internalizing problems, like depressive symptoms,</p> <p>7 and externalizing problems, like conduct disorders</p> <p>8 and acting out.</p> <p>9 Q. Thanks. That was going to be my next</p> <p>10 question.</p> <p>11 So, in other words, for this study, you</p> <p>12 relied on adolescents self-reporting to assess</p> <p>13 depression and anxiety symptoms, correct?</p> <p>14 A. Symptoms, correct.</p> <p>15 Q. Okay. If you turn to page 916 of this</p> <p>16 report. It's the Discussion section.</p> <p>17 A. Mm-hmm.</p> <p>18 Q. There, you conclude, quote (as read):</p> <p>19 The pandemic appears to have</p> <p>20 altered adolescent mental health</p> <p>21 and neurodevelopment, at least in</p> <p>22 the short-term.</p> <p>23 Is that correct?</p> <p>24 A. Yes, adversely affected the mental health</p> <p>25 of young people.</p>	<p style="text-align: right;">Page 76</p> <p>1 correct?</p> <p>2 A. Correct.</p> <p>3 Q. And this article is a 2021 article?</p> <p>4 A. Correct.</p> <p>5 Q. This is a longitudinal study, correct?</p> <p>6 A. Yes. It's the same longitudinal study.</p> <p>7 Q. And this study focused on the --</p> <p>8 evaluating the relationship between early life</p> <p>9 stress and later onset of depression, correct?</p> <p>10 A. I'm sorry, I just want to check to see --</p> <p>11 Q. Of course.</p> <p>12 A. -- if it's "onset" of depression.</p> <p>13 Q. Go ahead.</p> <p>14 A. So I don't -- I don't think, looking at</p> <p>15 this right now, that it's predicting onset. I think</p> <p>16 it's predicting levels of depression.</p> <p>17 Q. Okay.</p> <p>18 A. Depressive symptoms.</p> <p>19 Q. The final clause of the background</p> <p>20 statement --</p> <p>21 A. Yes.</p> <p>22 Q. -- on the first page says (as read):</p> <p>23 -- placing them at higher risk</p> <p>24 for developing symptoms of</p> <p>25 depression.</p>
<p style="text-align: right;">Page 75</p> <p>1 Q. And that is the conclusion you drew based</p> <p>2 on the analysis of the self-reporting tools that you</p> <p>3 used in this study, correct?</p> <p>4 A. Correct.</p> <p>5 Q. Okay.</p> <p>6 MR. GOOLD: When you're done with this, it</p> <p>7 would be about time for a break.</p> <p>8 MS. HAZAM: Absolutely. Let me just</p> <p>9 check. I have one more study. Is that an okay</p> <p>10 time? Similar.</p> <p>11 MR. GOOLD: Okay.</p> <p>12 MS. HAZAM: Okay.</p> <p>13 MR. GOOLD: If that's okay with the</p> <p>14 witness.</p> <p>15 MS. HAZAM: And -- if it's okay with you.</p> <p>16 THE WITNESS: It's fine.</p> <p>17 BY MS. HAZAM:</p> <p>18 Q. And this is another one you already have,</p> <p>19 which is Exhibit 13.</p> <p>20 A. Okay.</p> <p>21 Q. This is the one that is entitled "Early</p> <p>22 Life Stress Predicts Depressive Symptoms in</p> <p>23 Adolescents During the COVID-19 Pandemic: The</p> <p>24 Mediating Role of Perceived Stress."</p> <p>25 You're the leading author on this article,</p>	<p style="text-align: right;">Page 77</p> <p>1 That would be onset?</p> <p>2 A. We typically think of onset of a disorder,</p> <p>3 and this wasn't measuring disorders, but we can</p> <p>4 think of the development of symptoms.</p> <p>5 Q. Okay. And this study used the Traumatic</p> <p>6 Events Screening Inventory for Children, correct?</p> <p>7 A. Correct.</p> <p>8 Q. That's another self-reporting tool,</p> <p>9 correct?</p> <p>10 A. Well, it's not. It's an interview.</p> <p>11 Q. It's an interview. I see.</p> <p>12 And were the interviews conducted by</p> <p>13 psychologists?</p> <p>14 A. They were conducted by trained graduate</p> <p>15 students, postdoctoral fellows trained to do those</p> <p>16 interviews.</p> <p>17 Q. Mm-hmm. Let's see.</p> <p>18 You also used in this study the Center for</p> <p>19 Epidemiology Studies' Depression for Children scale,</p> <p>20 correct?</p> <p>21 A. Correct.</p> <p>22 Q. And was that a self-report tool?</p> <p>23 A. It was.</p> <p>24 Q. And you referred to it as a well-validated</p> <p>25 measure of depressive symptoms for older children</p>

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<p style="text-align: right;">Page 174</p> <p>1 spend five hours a day on social media?</p> <p>2 A. As a person, I think that's a lot, but as</p> <p>3 a scientist, I haven't seen those data.</p> <p>4 Q. What about eight hours per day?</p> <p>5 A. Same answer.</p> <p>6 Q. 15 hours per day?</p> <p>7 A. Same answer.</p> <p>8 Q. 20 hours a day?</p> <p>9 A. Let me think. Same answer.</p> <p>10 Q. Okay. Do you know if the defendants in</p> <p>11 this case allow children under 13 on their</p> <p>12 platforms?</p> <p>13 A. I don't know for sure. My understanding</p> <p>14 is that they don't collect data, privacy data, from</p> <p>15 anyone under 13. I'm not sure about allowing people</p> <p>16 under 13 on their platforms.</p> <p>17 Q. How do they know when someone is under 13,</p> <p>18 do you know?</p> <p>19 A. I don't know. I don't know.</p> <p>20 Q. Okay. Do you know if there are default</p> <p>21 time limits on how long minors can spend on</p> <p>22 defendants' platforms?</p> <p>23 A. I don't know that.</p> <p>24 Q. Do you know if there are limits on how</p> <p>25 many notifications teens on social media can get per</p>	<p style="text-align: right;">Page 176</p> <p>1 A. Oh, no.</p> <p>2 Q. Okay. Do you know what the difference is</p> <p>3 between an Instagram Reel and an Instagram Story?</p> <p>4 A. No.</p> <p>5 Q. Do you know how Instagram's algorithm</p> <p>6 works?</p> <p>7 A. No.</p> <p>8 Q. So do you know if it only delivers you</p> <p>9 things that you search for?</p> <p>10 A. I don't know that.</p> <p>11 Q. Do you know if the algorithm relies on</p> <p>12 content in determining what you see?</p> <p>13 A. I don't know how it works.</p> <p>14 Q. Okay. Do you know the difference between</p> <p>15 Facebook's News Feed and Timeline?</p> <p>16 A. No, I'm sorry, I don't.</p> <p>17 Q. When someone opens TikTok, do you know the</p> <p>18 first page they see by default?</p> <p>19 A. No.</p> <p>20 Q. Do you know what a stitch is on TikTok?</p> <p>21 A. No.</p> <p>22 Q. What is a Snap Streak?</p> <p>23 A. I have no idea.</p> <p>24 Q. Do you know what the fire emoji on</p> <p>25 Snapchat indicates?</p>
<p style="text-align: right;">Page 175</p> <p>1 day on platforms?</p> <p>2 A. I don't.</p> <p>3 Q. Do you know how many notifications, on</p> <p>4 average, teens do get per day on social media?</p> <p>5 A. I don't know that.</p> <p>6 Q. Do you have any sense of whether it's</p> <p>7 closer to, say, a dozen or hundreds?</p> <p>8 A. Hundreds. I don't know.</p> <p>9 Q. Okay. Do you know if there are default</p> <p>10 limits on the time of day that teens can get</p> <p>11 notifications on social media?</p> <p>12 A. I don't know if there are.</p> <p>13 Q. And do you know the approximate portion of</p> <p>14 those that they get during the school day and at</p> <p>15 night?</p> <p>16 A. I don't know that.</p> <p>17 Q. So you don't know if it's closer to, say,</p> <p>18 3 percent or 30?</p> <p>19 A. No, I'm sorry, I don't.</p> <p>20 Q. Okay. Do you know what an Instagram Story</p> <p>21 is?</p> <p>22 A. My understanding is that it's a video</p> <p>23 instead of a picture.</p> <p>24 Q. Okay. Do you know, when someone posts an</p> <p>25 Instagram Story, how long it stays visible?</p>	<p style="text-align: right;">Page 177</p> <p>1 A. I don't, other than someone saying</p> <p>2 something is hot, is my guess.</p> <p>3 Q. Okay. I'd like to show a video, which you</p> <p>4 will see when it's played in front of you, or there,</p> <p>5 whatever you prefer, on the screen.</p> <p>6 A. Okay.</p> <p>7 (Whereupon, Deposition Exhibit 34 was</p> <p>8 marked for identification.)</p> <p>9 MS. HAZAM: Do you have the one that we</p> <p>10 gave you just a little while ago?</p> <p>11 Okay. So this is essentially Exhibit 34.</p> <p>12 I can't hand it to you because it's a video, but</p> <p>13 it's Exhibit 34.</p> <p>14 MR. GOOLD: How is this going to work,</p> <p>15 logistically?</p> <p>16 MS. HAZAM: If you can watch it there, he</p> <p>17 can watch it there.</p> <p>18 MR. GOOLD: It doesn't come on here?</p> <p>19 MS. HAZAM: Is that your realtime?</p> <p>20 MR. GOOLD: The realtime.</p> <p>21 MS. HAZAM: You can see it here or there,</p> <p>22 or any of these places. If you need to move, let me</p> <p>23 know. Or you can stand. Whatever you want.</p> <p>24 MR. GOOLD: Thank you.</p> <p>25 MS. HAZAM: Okay.</p>

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<p style="text-align: right;">Page 178</p> <p>1 (Video played.)</p> <p>2 BY MS. HAZAM:</p> <p>3 Q. Dr. Gotlib, the video that we just played</p> <p>4 is Exhibit 34. That's you in that video, correct?</p> <p>5 A. I think so.</p> <p>6 Q. Are you certain?</p> <p>7 A. Yeah, I am -- yes, now I'm certain.</p> <p>8 Q. Are you familiar with the Precision Health</p> <p>9 and Integrated Diagnostic Center at Stanford?</p> <p>10 A. Yes.</p> <p>11 Q. Does it go by P-HIND or PHIND?</p> <p>12 A. PHIND.</p> <p>13 Q. PHIND. Okay.</p> <p>14 And are you familiar with PHIND's Gambhir</p> <p>15 symposium?</p> <p>16 A. Yes. Gambhir.</p> <p>17 Q. Gambhir. Thank you.</p> <p>18 And that was you presenting at the Gambhir</p> <p>19 symposium, correct?</p> <p>20 A. Correct.</p> <p>21 Q. That was in June 2023. Does that sound</p> <p>22 right?</p> <p>23 A. I'll take your word for that.</p> <p>24 Q. Okay. And in that presentation, you</p> <p>25 stated that social media exacerbated what we've</p>	<p style="text-align: right;">Page 180</p> <p>1 literature concerning causality and social media and</p> <p>2 depression or anxiety or other mental disorders?</p> <p>3 A. No, I had not examined that literature.</p> <p>4 Q. Okay. And in that snippet we were shown,</p> <p>5 you referred to bullying, did you not?</p> <p>6 A. I did.</p> <p>7 Q. Why would you have referred to bullying?</p> <p>8 A. That was a large part of my knowledge of</p> <p>9 social media at the time. In that video, I was</p> <p>10 trying to get the point across that we've known</p> <p>11 about this increase in depression for decades. And</p> <p>12 there were reports in the media at the time that I</p> <p>13 was giving this talk, and answering that question</p> <p>14 from the audience, about cyberbullying and its</p> <p>15 effects on children. And so that's what I was</p> <p>16 trying to describe.</p> <p>17 Q. When you refer to cyberbullying, is that</p> <p>18 content that comes from third parties that's posted</p> <p>19 on social media?</p> <p>20 MS. HAZAM: Objection.</p> <p>21 THE WITNESS: To my understanding, that's</p> <p>22 correct.</p> <p>23 BY MR. GOOLD:</p> <p>24 Q. Okay. Now, you referred to, in that video</p> <p>25 we saw, and various points during the deposition</p>
<p style="text-align: right;">Page 179</p> <p>1 already seen as increasing levels of depression and</p> <p>2 distress, correct?</p> <p>3 A. That's what I said, yes.</p> <p>4 Q. Okay.</p> <p>5 MS. HAZAM: That may be all I have. If we</p> <p>6 go off the record, I'll check and be able to come</p> <p>7 back and tell you, and we'll go from there. Okay.</p> <p>8 THE VIDEOGRAPHER: Stand by.</p> <p>9 The time is 1:38 p.m., and we're going off</p> <p>10 the record.</p> <p>11 (Whereupon, a recess was taken from</p> <p>12 1:38 p.m. to 2:07 p.m.)</p> <p>13 THE VIDEOGRAPHER: The time is 2:08 p.m.,</p> <p>14 and we are back on the record.</p> <p>15 EXAMINATION BY MR. GOOLD</p> <p>16 BY MR. GOOLD:</p> <p>17 Q. I have a few questions for you, Doctor.</p> <p>18 A. Okay.</p> <p>19 Q. Just before the break and the changeover,</p> <p>20 you were shown a snippet from a video, were you not?</p> <p>21 A. I was.</p> <p>22 Q. How long ago, to the best of your</p> <p>23 recollection, was that video taken?</p> <p>24 A. I was informed it was two years ago.</p> <p>25 Q. Okay. At that time, had you studied the</p>	<p style="text-align: right;">Page 181</p> <p>1 today, trends in prevalence of depression.</p> <p>2 Do you recall that just generally?</p> <p>3 A. Yes, I do.</p> <p>4 Q. And you were shown a number of studies by</p> <p>5 counsel for plaintiffs relating to that subject,</p> <p>6 right?</p> <p>7 A. Right.</p> <p>8 Q. Were you shown all the studies you have</p> <p>9 cited in your report on this subject?</p> <p>10 A. No, I was not.</p> <p>11 Q. Can you point us to studies you consider</p> <p>12 important in relation to the prevalence of</p> <p>13 depression?</p> <p>14 Before that, let me ask you this: When</p> <p>15 did increases in prevalence of depression in</p> <p>16 adolescents begin in the United States?</p> <p>17 MS. HAZAM: Objection. Vague.</p> <p>18 THE WITNESS: That's -- it's a hard</p> <p>19 question, but, for example, Jean Twenge analyzed</p> <p>20 data showing that, from 1930, rates of depressive</p> <p>21 symptoms have been increasing in adolescents, young</p> <p>22 college students.</p> <p>23 And there are data from Klerman and</p> <p>24 Weissman, from 1986 to 1989, showing very strong</p> <p>25 cohort effects; that is, every generation has higher</p>

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